

JUDGE SHADUR

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MAGISTRATE JUDGE COLE

UNITED STATES OF AMERICA

v.

MALCOLM CARPENTER and  
JUSTIN WILLIAMS

)  
) 13 CR 930  
)  
) Violations: Title 18, United States  
) Code, Sections 922(g)(1), 924(c)(1)(A)(ii),  
) and 2113(a)

FILED

JAN - 2 2014

COUNT ONE

The SPECIAL JULY 2013 GRAND JURY charges:

THOMAS G BRUTON  
CLERK, U S DISTRICT COURT

On or about December 4, 2013, at Homewood, in the Northern District of Illinois, Eastern  
Division,

MALCOLM CARPENTER and  
JUSTIN WILLIAMS,

defendants herein, did by force and violence, and by intimidation, take from the person and  
presence of a bank employee approximately \$80,288 in United States currency belonging to and in  
the care, custody, control, management, and possession of Bank of America, 18460 Governors  
Highway, Homewood, Illinois, the deposits of which were then insured by the Federal Deposit  
Insurance Corporation;

In violation of Title 18, United States Code, Section 2113(a).

**COUNT TWO**

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about December 4, 2013, at Homewood, in the Northern District of Illinois, Eastern Division,

MALCOLM CARPENTER  
and JUSTIN WILLIAMS,

defendants herein, knowingly used, carried, and brandished a firearm during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, namely bank robbery, in violation of Title 18, United States Code, Section 2113(a), as more fully set forth in Count One of this indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

**COUNT THREE**

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about December 4, 2013, at Homewood, in the Northern District of Illinois, Eastern Division,

MALCOLM CARPENTER  
and JUSTIN WILLIAMS,

defendants herein, having been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, namely, (i) a Taurus, model PT 111 Pro, 9-mm firearm, bearing serial number TCP47253, and (ii) an FNH, model FNX-9, 9-mm pistol, bearing serial number FX1U007682, which firearm had traveled in interstate commerce prior to the defendants' possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATION**

The SPECIAL JULY 2013 GRAND JURY further alleges:

1. Defendants shall forfeit to the United States of America, any firearms or ammunition:

a. involved in or used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession or under the immediate control of the defendant at the time of arrest, as provided in Title 18, United States Code, Section 3665, upon conviction of any offense for committing any felony involving the use of threats, force, or violence or perpetrated in whole or in part by the use of firearms.

2. The property to be forfeited includes, but is not limited to:

a. a Taurus, model PT 111 Pro, 9-mm firearm, bearing serial number TCP47253, and associated ammunition; and

b. an FNH, model FNX-9, 9-mm pistol, bearing serial number FX1U007682, and associated ammunition.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY